

MEMO ENDORSED

**Marc Fishman**  
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Via Hand Delivery and Facsimile

July 24, 2019

Honorary Judge Ken Karas  
United States District Judge  
United States District Court  
Southern District of New York  
United States Courthouse  
300 Quarropas Street, Chambers 533  
White Plains, NY 10601-4150

Re: 7-18-CV-00282-KMK

Request to file for Injunctive relief against defendant's Michelle D'ambrosio,  
Nancy Barry and Dan Weitz and opposition to defendant's motion to dismiss

*The Court continues this letter  
as Plaintiff's response memorandum  
in opposition to the Motions To  
Dismiss Filed at Dist. Nos. 67, 70.  
Defendants should file replies  
by 8/16/19. So ordered.*

SO ORDERED

*[Signature]*  
KENNETH M. KARAS U.S.D.J.

Dear Honorable Judge Karas:

The Clerk of the Court is directed to  
mail a copy of this Order to the Plaintiff

I am writing in opposition of defendant's motion to dismiss. Defendant D'ambrosio(acting in her administrative capacity) told me directly in the entrance of Yonkers Family Court that my notetaker could not enter the courtroom in May of 2016, June 2016, July 2016 and August 2016. This action outside of the physical courtroom was an administrative act, not a judicial one. This act of willful, purposefull, intentional and direct administrative disability discrimination violates the ADA, Section 504 of the 1973/74 rehabilitation Act, The New York Family Court Act and New York State Human Rights Laws.

The ada under USC 12131-12165 provides that "no qualified individual with a disability shall by reason of such disability, be excluded from participation in it denied the benefits of services, programs or activity of a public entity or be subject to discrimination by any such entity." While defendant dambrosio, denied my notetaker entry, she allowed defendant's legal services of the Hudson valley notetakers entry into the court for my ex-wife. Defendant dambrosio knew I had writing, hearing and memory disabilities associated with occipital neuralgia, tbi and post concussion syndrome. As I handed her my medical documents multiple times. To allow opposing counsel notetakers into the courtroom for my ex-wife who is not disabled, but deny me is the definition of discrimination in an

